



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

18/OPP#34/33
A SM
(2PP)

MAR 20 1998

CERTIFIED MAIL

Cheminova, Inc.
Attention: P. Leanne Pruett
1700 Route 23, Suite 210
Wayne, NJ 07470

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

RECEIVED

JUL 29 1998

OFF PUBLIC INQUIRY

Dear Ms. Pruett:

The purpose of this letter is to initiate implementation of the risk mitigation proposals for ethion set forth in a letter from FMC Corporation to the Agency dated 7-26-95. These proposals are being used for the risk assessments currently being conducted in support of reregistration and implementation of the Food Quality Protection Act of 1996 (FQPA). This being the case, the Agency believes it is important that all ethion labels be amended to reflect the specific proposals listed below:

- * Reduction of the maximum rate of application from 2.5 - 3.0 lbs/ai/A to 2.5 lbs./ai/A.
- * Reduction of the maximum number of applications from three per year to two per year.
- * Prohibition of aerial applications.
- * Restrictions on airblast applications (airblast outside three rows from outside the grove with nozzles of sprayer on grove side only; nozzles facing away from the grove must be turned off; shut off spray when turning at end of rows and when passing gaps in tree rows; direct spray away from bodies of water).

Additionally, your label should specify that your product is only for formulation into products for use on citrus in Florida and Texas. This is a change that has already been made by other ethion registrants.

Label amendments must be submitted as formal amendments on EPA Form 8570-1 along with five copies of the revised label. This package should be addressed to Tina Levine, Chief, Insecticide-Rodenticide Branch, Registration Division (7504C), Office of Pesticide Programs, U.S. Environmental Protection Agency, 401 M Street SW, Washington, D.C. 20460. A courtesy copy should also be sent to Mark Hartman, Reregistration Branch II, Special Review and Reregistration Division (7508W) at the above address.

(1)

We request that all label amendments be submitted to the Agency by April 30, 1998.
All companies with ethion registrations will be asked to submit amendments per this schedule.
If you have any further questions or comments please contact Mark Hartman at
(703) 308-0734.

Sincerely,



Lois A. Rossi
Director
Special Review and Reregistration
Division